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7 Attorneys for Defendants, **SIERRA MENTAL WELLNESS**
8 **GROUP, JOSH SIMPSON, and SHELLI WATSON, sued**
9 **herein as SHELLE WATSON**

10 **UNITED STATES DISTRICT COURT**
11 **CENTRAL DISTRICT OF CALIFORNIA**

12 LINDA COOPER, Individually, and on)
13 the behalf of the Estate of Decedent,)
14 ELINA QUINN BRANCO,)

15 Plaintiffs,)

16 vs.)

17 COUNTY OF SAN LUIS OBISPO, a)
18 government entity, form unknown;)
19 SIERRA MENTAL WELLNESS)
20 GROUP, a California non-profit)
21 corporation; JASON HOOSON,)
22 individually, SAVANNAH)
23 WILLIAMS, individually; JOSH)
24 SIMPSON, individually; BONNIE)
25 SAYERS, individually; JULIA TIDIK,)
26 individually; BETHANY AURIOLES,)
27 individually; JANET BROWN,)
28 individually; SHELLE WATSON,)
inclusive,)

Defendants.)

CASE NO: 2:24-cv-08187-CV (AJRx)

District Judge: Cynthia Valenzuela,

Court Room 10A

Magistrate Judge: A. Joel Richlin

**STIPULATED JOINT REQUEST FOR
RULING ON SUBMITTED MATTERS**

[Local Rule 83-9.2]

Complaint Filed: September 25, 2024

Trial Date: March 11, 2026

25 **TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF**
26 **RECORD:**

27 **PLEASE TAKE NOTICE** that Plaintiffs LINDA COOPER, Individually, and
28 on the behalf of the Estate of Decedent, ELINA QUINN BRANCO (“Cooper”), Plaintiff



JEFFREY BRANCO, JR. (“Branco”), Defendants SIERRA MENTAL WELLNESS GROUP, JOSH SIMPSON, and SHELLI WATSON, sued herein as SHELLIE WATSON (“Sierra”), Defendant SAVANNAH WILLIAMS (“Williams”), Defendant BETHANY AURIOLES (“Aurioles”), Defendant JULIA TIDIK, NP (“Tidik”) and Defendants COUNTY OF SAN LUIS OBISPO and JASON HOOSON (“County”), Defendants BONNIE SAYERS and JANET BROWN (“Sayers”), by and through their respective counsel of record, hereby submit this Stipulation and Joint Request for Ruling, pursuant to Local Rule 83-9.2, on the following submitted matters:

1. Sierra Defendants’ Motion to Dismiss Plaintiffs’ Punitive Damages Allegations (F.R.C.P. 12(b)(6)) [ECF 119];

On July 23, 2025, the Court vacated the hearings on the motion referenced above, which was set for hearing on July 25, 2025. [ECF 133];

Pursuant to Local Rule 83-9.1.1, the Court took this matter under submission on a date before the last memorandum was permitted to be filed, which was August 6, 2025 for Sierra Defendants’ Reply in Support of their Motion to Dismiss [ECF 134.] On July 11, 2025, the Sierra Defendants’ filed a Notice of Non-Opposition to their Motion to Dismiss. [ECF 127.] On July 17, 2025, the Cooper Plaintiffs filed a late Opposition to the Sierra Defendants’ Motion to Dismiss. [ECF 130.] On July 23, 2025, the Court issued an Order allowing the Cooper Plaintiffs’ late Opposition, allowing the Sierra Defendants until August 6, 2025 to file their Reply and taking the matter under submission. [ECF 133.]

No decision has been issued and, as required by Local Rule 83-9.2, counsels hereby jointly and respectfully request that a decision be made.

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1 IT IS SO STIPULATED.

2 Dated: November 26, 2025

3 **VEATCH CARLSON, LLP**

4 By: 

5 Mark M. Rudy, Esq.

6 Serena L. Nervez, Esq.

7 Kenneth W. Baisch, Esq.

8 *Attorneys for Defendants, SIERRA MENTAL*
9 *WELLNESS GROUP, JOSH SIMPSON, and*
10 *SHELLI WATSON*

11 Dated: November 26, 2025

12 **THE SEHAT LAW FIRM, PLC**

13 By: /s/ Cameron Sehat

14 Cameron Sehat, Esq.

15 Jeffrey Mikel, Esq.

16 Nathalie Smith, Esq.

17 Andrea Monge, Esq.

18 *Attorneys for Plaintiff, LINDA COOPER,*
19 *Individually and on behalf of the Estate of Elina*
20 *Quinn Branco*

21 Dated: November 26, 2025

22 **HEINRICH LAW, PC**

23 By: /s/ Ethan W. Wimert

24 Marjorie Heinrich, Esq.

25 Ethan A. Wimert, Esq.

26 *Attorney for Proposed Plaintiff in Intervention,*
27 *JEFFREY BRANCO, JR.*

28 Dated: November 26, 2025

ALTAIR LAW

By: /s/ Jasleen Singh

Andje M. Medina, Esq.

Jasleen Singh, Esq.

Attorney for Proposed Plaintiff in Intervention,
JEFFREY BRANCO, JR.

Signatures Continue on the Following Page

Signatures Continued from the Previous Page

Dated: November 26, 2025

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By: /s/ Lawya L. Rangel
Katharine L. Spaniac, Esq.
Richard R. Clouse, Esq.
Yolanda E. Lopez, Esq.
Lawya L. Rangel, Esq.
Attorneys for Defendant, SAVANNAH WILLIAMS

Dated: November 26, 2025

FRIEDENTHAL, HEFFERNAN & BROWN

By: /s/ Daniel R. Friedenthal
Daniel R. Friedenthal, Esq.
Attorneys for Defendant, BETHANY AURIOLES

Dated: November 26, 2025

WOOD, SMITH, HENNING & BERMAN

By: /s/ Crystal L. Rorabaugh
Brian L. Hoffman, Esq.
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Attorneys for Defendant, JULIA TIDIK, NP

Dated: November 26, 2025

SMITH LAW OFFICES, LLP

By: Counsel Declined to Sign the Joint Request
Attorneys for Defendants, COUNTY OF SAN LUIS OBISPO and JASON HOOSON

Dated: November 26, 2025

MESSNER REEVES LLP

By: /s/ Ethan Reimers
Andrew Hollins, Esq.
Ethan Reimers, Esq.
Attorneys for Defendants, BONNIE SAYERS and JANET BROWN



ELECTRONIC SIGNATURES

Pursuant to Local Rule 5-4.3.4(2), the filer attests that all signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

Dated: December 17, 2025

VEATCH CARLSON, LLP



By: _____

Mark M. Rudy, Esq.

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Kenneth W. Baisch, Esq.

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CERTIFICATE OF SERVICE
Linda Cooper v. County of San Luis Obispo, et al.
Case No.: 2:24-cv-08187-CV (AJRx)

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is 1055 Wilshire Boulevard, 11th Floor, Los Angeles, California 90017-2444.

On **December 17, 2025**, I served the foregoing document described as: **JOINT REQUEST FOR RULING ON SUBMITTED MATTERS** on interested parties in this action by one or more of the following methods:

(SEE ATTACHED SERVICE LIST)

☒ **BY CM/ECF NOTICE OF ELECTRONIC FILING:** I electronically filed document(s) with the Clerk of the Court by using the CM/ECF system. Participants in this case who are registered CM/ECF users will be served by the CM/ECF system. Participants in this case who are not registered CM/ECF users will be served by mail or by other means permitted by the court rules.

☒ **FEDERAL:** I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

I declare under penalty of perjury under the laws of the United States of America and State of California, that the foregoing is true and correct. Executed on **December 17, 2025**, at Los Angeles, California.

Crisdena DeHerrera
Type or Print Name


Signature



SERVICE LIST

Linda Cooper v. County of San Luis Obispo, et al.
Case No.: 2:24-cv-08187-DDP (AJRx)

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